

# **EXHIBIT B-4**

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11 *Attorneys for Defendant Google LLC*

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

14  
15 CHASOM BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Case No. 5:20-cv-03664-LHK-SVK  
Case No. 5:20-cv-05146-LHK-SVK

16 Plaintiffs,

**AFFIDAVIT OF STEVEN M. BAUER  
PURSUANT TO 28 U.S.C. § 455**

17 v.

18 GOOGLE LLC,  
19 Defendant.

Referral: Hon. Susan van Keulen, USMJ

20  
21 PATRICK CALHOUN, *et al.*, on behalf of  
themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC,  
25 Defendant.

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Case No. 5:20-cv-03664-LHK-SVK  
Case No. 5:20-cv-05146-LHK-SVK

1 I, Steven M. Bauer, certify and declare as follows:

2 1. I am an attorney duly licensed in the States of Massachusetts (SBN 542531) and  
3 Maine (SBN 006666). I am being considered for an appointment to serve as Special Master in the  
4 above referenced matters and make this affidavit pursuant to Federal Rule of Civil Procedure  
5 53(b)(3).

6 2. I am qualified to be appointed as a Special Master in these matters under the  
7 disqualification rules provided in 28 U.S.C. § 455. There is no provision in 28 U.S.C. § 455 that  
8 disqualifies me from being appointed a Special Master.

9 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
10 and correct. Executed in Eliot, Maine on June 26, 2021.

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DATED: June 26, 2021

  
STEVEN M. BAUER

Case No. 5:20-cv-03664-LHK-SVK

Case No. 5:20-cv-05146-LHK-SVK

1 **ATTESTATION**

2 Pursuant to Civil Local Rule 5.1, I hereby attest that Steven M. Bauer, represented by a  
3 conformed signature above, has concurred in the filing of this Affidavit.

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5 DATED: June 28, 2021

*/s/ Andrew H. Schapiro*

Andrew H. Schapiro

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